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Attorneys for: **Lindsey Martine Cameron**

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(HON. JANIS L. SAMMARTINO)

UNITED STATES OF AMERICA,

Plaintiff,

v.

LINDSEY M. CAMERON,

Defendant.

) Case No. **07CR3293-JLS**

) **JOINT MOTION TO CONTINUE**
) **SENTENCING SENTENCING HEARING;**
) **SUPPORTING DECLARATION OF**
) **COUNSEL**

) Hearing Date: **April 25, 2008**

) Hearing Time: **9:00 AM**

) Courtroom: **6 (3rd Flr-JLS)**

)

)

THE PARTIES JOINTLY MOVE THIS COURT for an order continuing the
sentencing hearing in the above-captioned case from April 25, 2008 at 9:00 AM to June 6, 2008
at 9:00 AM. The reasons for the continuance are set forth in the Declaration of Counsel attached
hereto.

Date: March 4, 2008.

____s/ William W. Brown_____
William W. Brown, BROWN & ASSOCIATES
Attorneys for **Lindsey M. Cameron**

Date: March 4, 2008

____s/ Joseph Orabona_____
ASSISTANT UNITED STATES ATTORNEY

**DECLARATION OF COUNSEL IN SUPPORT OF STIPULATION TO CONTINUE
SENTENCING SENTENCING HEARING**

I, William W. Brown, state:

1. I am an attorney at law duly licensed to practice before all of the courts in the State of California, the United States District Court for the Southern District of California, the United States Court of Appeals for the Ninth Circuit, and the United States Supreme Court. I am appointed under the Criminal Justice Act, 18 U.S.C. § 3006A, to represent Lindsey M. Cameron.

2. Ms. Cameron was recently released on bond, the conditions of her Pre-trial Release require a mental health program and resolution of all outstanding state matters.

3. I continue to work with her Pre-trial Services supervising officer to ensure compliance with the conditions set by Magistrate Judge Stormes.

4. I also need additional time to adequately prepare for my client's Pre-sentence interview anticipating the documentation can be presented showing resolution of the matters discussed above and compliance with her Pre-trial conditions. I continue to coordinate a convenient date with USPO John Pick to complete the Pre-sentence Report Interview well in advance of his dictation date. A resetting of the sentencing hearing will also reset his dictation date.

5. My client has no objection and has executed an acknowledgment of next court date.

I DECLARE, UNDER PENALTY OF PERJURY, THAT THE FOREGOING IS TRUE AND CORRECT.

Date: March 4, 2008.

s/ William W. Brown
WILLIAM W. BROWN

ACKNOWLEDGMENT OF NEXT COURT DATE

I, Lindsey CAMERON, having been advised by counsel, William W. Brown acknowledge that the next court date requiring my personal appearance in the United States District Court for the Southern District of California is **June 6, 2008** at **9:00 AM**.

Date: March 4, 2008

Lindsey Cameron
Lindsey CAMERON

CERTIFICATE OF SERVICE

U.S. v. Cameron 07CR3293-JLS

I, the undersigned, hereby certify that a copy of **JOINT MOTION TO CONTINUE SENTENCING HEARING** was:

☒ **Deposited with Court Clerk:** I, the undersigned, hereby certify that a copy of the **above-referenced document(s)** was deposited with the Clerk of the United States District Court for the Southern District of California for delivery to Assistant United States Attorney, **Joseph Orabona**.

☐ **Personal Service of Copy to AUSA:** I, the undersigned, hereby certify that I personally delivered a true copy of the above-referenced document(s) to the receptionist of the Office of the United States Attorney for the Southern District of California for immediate delivery to Assistant United States Attorney, **Joseph Orabona**.

☐ **Personal Service of Original to Chambers:** I, the undersigned, hereby certify that I personally delivered the original of the above-referenced document(s) to the Chambers of the Honorable **Janis L. Sammartino**.

☐ **Facsimile Service of Courtesy Copy to AUSA:** I, the undersigned, caused a facsimile transmission a true copy of the above-referenced document(s) from 619-234-3655 to **Joseph Orabona** at the Office of the United States Attorney for the Southern District of California, facsimile machine telephone number.

☐ **Facsimile Service of Courtesy Copy to Chambers:** I, the undersigned, caused a facsimile transmission a true copy of the above-referenced document(s) from 619-234-3655 to the Chambers of the Honorable **Janis L. Sammartino**, facsimile machine telephone number.

☐ **Service by Mail [CivLR5.3]:** I, the undersigned, hereby certify that a true copy of the above-referenced document(s) was served upon all counsel of record by postage prepaid, first-class, United States Postal Service mail to there last known address at: **SEE ATTACHED SERVICE LIST**.

Executed on March 4, 2008, at San Diego, California.

s/ William W. Brown